

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MB, A MINOR, BY AND THROUGH
JAMES ROCCO, III, ESQUIRE,
HER GUARDIAN AD LITEM,

Minor-Plaintiff

Vs.

SCHUYLKILL COUNTY, et al.,

Defendants and
Third Party Plaintiffs

: Civil Action
: **No. 18-CV-00756-GEKP**
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STIPULATION OF DISMISSAL WITH PREJUDICE
AND MUTUAL RELEASE

AND NOW, this 16 day of April 2020, IT IS STIPULATED and AGREED by and between Schuylkill County and Marcia Hoke (hereinafter "Schuylkill County defendants) and KidsPeace, KidsPeace National Centers, KidsPeace Corporation, Kelly O'Hara, Heather Moore and Cori Ruszkowski (hereinafter "KidsPeace Defendants") stipulate and agree as follows:

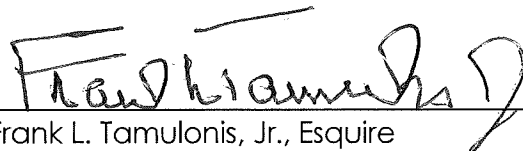
1. The Crossclaim filed by Schuylkill County versus KidsPeace National Centers, Inc., is dismissed with prejudice, including all claims which were asserted or could have been

asserted in said Crossclaim against any of the KidsPeace defendants.

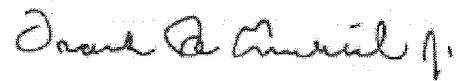
2. For purposes of forever settling, discontinuing and ending all suits, claims and crossclaims between them in the action known as *M.B. v. Schuylkill County, et al.*, United States District Court for the Eastern District of Pennsylvania, Docket No. 2:18-cv-00756-GEKP, this dismissal represents a full and final settlement and mutual release between Schuylkill County Commissioners, through Schuylkill County Children & Youth Services/Schuylkill County Juvenile Justice Department, on one hand, and KidsPeace National Centers, Inc. and KidsPeace Corporation on the other together with both sides employees, servants, officers, executors, administrators, directors, subsidiaries, agents, affiliates, heirs, successors, and assigns related to claims they ever had on account of by reason of any cause, matter or thing whatsoever that was asserted or could have been asserted in the Action including claims, crossclaims, causes of action, suits, injuries, damages, losses and rights which otherwise arose out of the

placement at issue in the Action.

LIEBERMAN, TAMULONIS & HOBBS

BY: 
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defendants

ECKERT SEAMANS CHERIN & MELLOTT, LLC


BY: _____
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